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REMARKS

In response to the Office Action mailed on July 26, 2005, Applicants respectfully request reconsideration. To further the prosecution of this Application, Applicants submit the following amendment to claim 39 (to correct a dependency issue) as well as remarks discussing patentability of rejected claims.

Claims 1-28, 32, 36, 37, 39-49, and 53-61 were previously pending in the subject Application. The following remarks address the rejections of claims 1-28, 32, 36, 37, 39-49, and 53-61 1-58 as set out in the present Office Action.

Applicants respectfully request reconsideration and allowance of the claims.

Rejection of Claims 1-24, and 32 under 35 U.S.C. §103(a)

The Examiner rejects pending claim 1 under 35 U.S.C. §103(a) as being unpatentable over Sengupta (U.S. Patent 6,359,647) in view of Fowler (U.S. Patent 6,714,977) and in further view of England (U.S. Patent 6,359,647). The Office Action likens elements in these references to those in claim 1 to reject the claimed invention. Applicants respectfully traverse the rejection and provide an analysis of how the claim differs over and are not obvious in view of the cited art.

Applicants submit that the current rejection is improper for a number of reasons. First, even the combination of references does not teach or suggest every claim limitation. Second, there is no specific suggestion to combine the techniques in the other reference to render the claim obvious.

1.) Claim 1 includes limitations not found in any of the cited references.

The Examiner admits that neither Sengupta nor Fowler expressly teach or suggest the limitation of: "a website for receiving the event data from the transmitter and making the event data accessible for viewing by at least one authorized entity, the website generating a web page viewed by a central monitor that makes an initial determination whether action is required and, if a

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determination is made by the central monitor that action is required, the central monitor notifies at least one other authorized entity to access the web page." For this claim limitation, the Examiner cites several passages in England.

Applicants respectfully submit that claim 1 includes limitations not disclosed by England. For example, claim 1 recites that a central monitor views the web page (e.g., event data associated with an event detected on the premises) and initially determines whether the event data warrants action. There is no indication whatsoever in England that the guide views a web page to make a determination of whether action should be taken based on the "event data" in the web page as in the claimed invention. Instead, England at column 11, lines 34-37 merely indicates that the client or guide can initiate a collaborative session. There is no specific disclosure or suggestion in this cited passage that the guide initiates the session in response to viewing a web page, let alone a web page including "event data" as in the claimed invention. The disclosure in England actually teaches away from claim 1 because England discloses that collaborative sessions (with a respective client) are opened prior to reviewing any web page information or knowledge that an event occurs. In the claimed invention, the central monitor does not have "a session" of notifying another entity until after making the determination that action is required in response to a detected event.

Additionally, England does not disclose the claim limitation that "the central monitor notifies at least one other authorized entity to access the web page." For example, England discloses at column 8, lines 2-8 that the guide propagates information over a network for display at the client system. Thus, England teaches that the guide accesses and forwards the web page to the client. The client in England is therefore not notified to access a web page as in the claimed invention.

Furthermore, claim 1 recites that the central monitor notifies an "authorized entity" to access the web page. The state of being an authorized entity (to view the

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web page) exists prior to being notified. Thus, claim 1 implies that the "event data" in the web page is sensitive or secured information. England provides no indication that any web pages require that a person be authorized to access them.

Because the cited reference does not disclose the claim limitation of "the website generating a web page viewed by a central monitor that makes an initial determination whether action is required and, if a determination is made by the central monitor that action is required, the central monitor notifies at least one other authorized entity to access the web page," Applicants submit that the Examiner is using the claim language as a blueprint to reject claim 1.

Applicants submit that claim 1 is patentable because it recites a novel and useful technique never used in or even suggested by the prior art. For example, the technique of the central monitor reviewing the web page and notifying another authorized entity to access the web page enables securing of a premises base don events such as unlawful intrusions. Although Sengupta and Fowler happened to be directed to security systems, there is no indication whatsoever in England that a respective "guide" monitors a web page for security purposes as in the claimed invention.

2.) There is no motivation to combine the references.

Applicants would like to further point out, in addition to not reciting every claim limitation as discussed above, there is no teaching or suggestion in Sengupta, Fowler, and/or England to combine the references. For example, England recites that corresponding clients communicate with a respective guide in a collaboration session. During the collaboration session, both the guide and corresponding client in England retrieve and forward data to each other. However, there is no indication in England that the guide notifies any specific user to join a respective collaboration in which to convey a communication such as a notification that the user should access a web page that also happens to be viewed by the

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guide. Nor is there any indication that the guide in England reviews "event data" in the web page regarding a detected event on a monitored premises.

Where is the specific teaching in England that the "guide" monitor a web page including event data and, based on detected event data in the web page, notifies another entity to access the web page?

Based on the aforementioned remarks and distinctions, Applicants respectfully submit that the invention as recited in claim 1 is neither anticipated nor obvious because it includes a unique and useful configuration not taught or suggested by Sengupta, Fowler, England, or any other reference of record. Thus, in view of the foregoing discussion, Applicants submit that claim 1 is patentably distinct and advantageous over the cited prior art, and the obviousness rejection should be withdrawn. Accordingly, allowance of claim 1 as well as corresponding dependent claims 2-24 and 32 is respectfully requested.

Claim 25 includes similar limitations as recited in claim 1 above. For applicable reasons as discussed above, claim 25 and corresponding dependent claims 26-28 and 36 are patentably distinct over the cited prior art.

Claim 48 includes similar limitations as recited in claim 1 above. For applicable reasons as discussed above, claim 48 and corresponding dependent claims 49 and 53-55 are patentably distinct over the cited prior art.

Note that claims 20 and 21 further distinguish the claimed invention over the cited prior art. For example, claim 20 recites "wherein the website is accessed by the at least one authorized entity to communicate with the controller for remotely instructing the controller to perform functions." Applicants respectfully submit that figure 8 as well as corresponding text in Fowler does not disclose that the website generated by netbot can be accessed to control different functions associated with

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the netbot, especially as further defined in claim 21 that recites "wherein the functions are one of activating the system, deactivating the system, reviewing past events occurring on the system or accessing maintenance information." Figure 8 of Fowler merely shows components of a netbot, not that netbot can be controlled via a respective web page. The Examiner cites figure 6b of Sengupta to reject claim 21. This cited figure also does not teach or suggest enabling an authorized user to use the website to control system functions.

Applicants respectfully request that the Examiner specifically point out the recited functionality or allow both claims 20 and 21 over the cited prior art.

Regarding claim 23, the Examiner argues that "websites are accessed over the Internet and are therefore access by more than one entity." Applicants respectfully submit that claim 23 recites further limitations than merely multiple persons accessing the same website. For example, claim 23 recites "wherein the two entities simultaneously accessing the website communicate with each other to determine a course of action for handling the event." This technique enables to utilize the web page and determine a course of action to handle the event. Applicants respectfully submit that the "event" according to claim 23 and as defined in claim 1 occurs in a premises and is detected by at least one sensor. This aspect of the invention is not taught or suggested by any of the cited references.

Regarding claims 24, 26, 47, 55, and 58, there is no indication to which figure 1 the Examiner refers. Neither Sengupta, Fowler, nor England disclose that a control monitor and at least one authorized entity view "live" event data.

Rejection of Claims 37 and 39-47 under 35 U.S.C. §103(a)

Applicants respectfully submit that claim 37 includes the limitation of "a switch coupled to the controller and actuated by a user witnessing the image on the at least one display device causing the controller to transmit the image to a

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website that receives the image and makes the image accessible by at least one authorized entity on a web page, wherein at least two authorized entities access the web page simultaneously." The Examiner cites Fowler at column 7 lines 9-40 to reject the aspect of displaying an image on a respective web page. Applicants respectfully submit that the claimed invention does not merely recite displaying an image on a web page but instead recites that a user views a captured image on a display screen and thereafter causes a respective controller to transmit the image to a web page for viewing by multiple persons.

Fowler at column 7, lines 44-48 recites that the netbot is automatically programmed to capture an image of a server room. There is no indication whatsoever that a user viewing a captured image on a display screen causes transmission of the image to a web page. This technique can be used to selectively send images to a respective web page based on a decision by the user rather than blindly send all captured images to a web page. Thus, the user witnessing the image performs a filtering function not taught or suggested by the cited art.

What specific passages in the cited references disclose this claim limitation?

Applicants respectfully request allowance of claim 37 over the cited prior art. Dependent claims 39-47 are allowable because they depend from claim 37.

Note that claim 45 further recites that a user examining the image actuates a switch depending on detection of a specific type of event requiring action. The passages in Fowler as cited by the Examiner only indicate that a respective security system sends notifications to an administrator of an event. Claim 45 recites that the user examining the image causes activation of the switch. The cited reference is an automated machine; there is no user as described in the claimed invention. Also, the claim recites that the user activates the switch if the

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event is of a type requiring action. This claimed invention requires the user to make a conscious decision based on the image in the display screen and actuate a switch. This limitation is not taught or suggested by any of the cited references.

Claim 57 includes similar limitations as recited in claim 37 above. For applicable reasons as discussed above, claim 57 and corresponding dependent claims 58-61 are patentably distinct over the cited prior art.

Note that dependent claims 59-61 include further limitations over the cited prior art. For example, claim 59 recites: "enabling the user residing at a monitoring station to communicate with the at least one authorized entity via a communication channel over the website while both user and the at least one authorized entity simultaneously view the image on the respective web page." As discussed above, England does not recite that the guide views a web page of an image of an event.

Regarding claim 60, the Examiner misinterprets the claim language. For example, the Examiner argues that Sengupta discloses "a system that has one individual located at a premises monitored by the at least one camera" to reject the claimed invention. The claim recites "providing a two way communication link to enable the user to communicate with at least one individual located at a premises monitored by the at least one camera." This means that the user, who makes a decision to create the web page with respective images, communicates with an individual that resides at the premises monitored by the camera. There is no indication in Sengupta that the person being monitored by the respective security system cameras (e.g., a person on the premises) in Sengupta is able to communicate with a person viewing images of the premises as generated by the camera.

Regarding claim 61, there is no indication in the cited references that the authorized entity viewing the web page is a corresponding owner of the premises

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monitored by the at least one camera. Also, contrary to the Examiner's argument, England does not teach or suggest providing a communication link to enable the owner of the premises (being monitored) to communicate with a person at the premises being monitored.

Applicants therefore respectfully request allowance of these claims over the cited art.

CONCLUSION

In view of the foregoing remarks, Applicants submit that the pending claims as well as newly added claims are in condition for allowance. A Notice to this affect is respectfully requested. If the Examiner believes, after reviewing this Response, that the pending claims are not in condition for allowance, the Examiner is respectfully requested to call the Representative.

Applicants hereby petition for any extension of time which is required to maintain the pendency of this case. If there is a fee occasioned by this response, including an extension fee, that is not covered by an enclosed check, please charge any deficiency to Deposit Account No. <u>50-0901</u>.

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Respectfully submitted,

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